

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JANE DOE, in her individual capacity,

Plaintiff,

-against-

Case No.: 7:18-cv-08728-KMK

**BARD COLLEGE and BARD COLLEGE
BOARD OF TRUSTEES**

Defendant.

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**DECLARATION OF CARRIE
GOLDBERG IN SUPPORT
OF GOLDBERG'S MOTION TO
WITHDRAW AS COUNSEL**

I, Carrie Goldberg, respectfully submit this Declaration pursuant to Local Civil Rule 1.4, in support of the motion of C.A. Goldberg PLLC ("Goldberg") to withdraw as counsel for Plaintiff Jane Doe ("Plaintiff Doe"). The reasons for withdrawal are as follows:

1. I am counsel for Plaintiff Jane Doe in this matter. I make this declaration based on my personal knowledge, in support of Goldberg's Motion to Withdraw as Counsel for Plaintiff Jane Doe.
2. I met with Plaintiff Doe on March 13, 2019 and discussed the existence of certain strategic differences and her desire to obtain new counsel.
3. I explained the procedure for attorney withdrawal and that changing attorneys could result in delay.
4. As stated in her affidavit dated March 13, 2019 Plaintiff Doe no longer wished to be represented by Goldberg and discharged Goldberg as counsel on March 13, 2019,. Dkt. 34-1.
5. Plaintiff Doe cited "strategic differences" as the reason for discharging Goldberg. Dkt. 34-1.

6. The parties have not commenced discovery, and no parties have submitted any dispositive motions ; therefore, the timing of withdrawal should not substantially disrupt litigation or cause prejudice to either Plaintiff or Defendants.
7. I spoke with Counsel for Defendants on March 14, 2019 to inform them that Goldberg would be seeking to withdraw from the case and would be requesting a 60-day extension for Plaintiff Doe to find replacement counsel and for that counsel to file a Second Amended Complaint.
8. On March 14, 2019 this Court granted leave to file the Motion to Withdraw as Counsel and granted Plaintiff Jane Doe a sixty (60) day extension to file a Second Amended Complaint.
9. If allowed to withdraw, Goldberg will fully cooperate with successor counsel to familiarize them with Plaintiff Doe's case.
10. Goldberg has no lien on the case and will not place a lien on the case in the future.
11. If the Court requires more information we request that any additional submissions describing this matter be made under seal or that the parties meet *in camera* to minimize potential prejudice to Plaintiff.
12. Attached as Exhibit A is a copy of Plaintiff Doe's March 13, 2019 Affidavit, which has previously been submitted as an Exhibit to Goldberg's March 14, 2019 Letter-Motion. Dkt 34-1.
13. Attached as Exhibit B is a Copy of Plaintiff Doe's First Amended Complaint, as per Judge Karas' Individual Rule II(B), which has previously been filed via ECF on December 11, 2018. Dkt. 10.
14. I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 28, 2019
Brooklyn, New York

Respectfully submitted,

C.A. GOLDBERG PLLC

By: /s/ Carrie Goldberg
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